

**Zell & Associates International Advocates LLC**

1345 6<sup>th</sup> Avenue, 2<sup>nd</sup> Floor  
New York, New York 10105  
Telephone: 212-971-1349, Facsimile: 212-253-4030

December 9, 2020

**By Email & ECF**

Honorable Judge Mary Kay Vyskocil  
United States District Court for the  
Southern District of New York  
500 Pearl Street  
New York, NY 10007-1312

ADYB ENGINEERED FOR LIFE, INC. v. EDAN ADMINISTRATION SERVICES, LTD., ET AL.  
1:19-cv-07800 (S.D.N.Y.)

Dear Hon. J. Vyskocil:

We represent Defendants Edan Administration Services (Ireland) Ltd., and POM Advanced Armor Solutions LLC in the above-captioned action. Plaintiff ADYB Engineered for Life, Inc. is represented by Henry J. Cittone from Cittone Demers & Arneri LLP.

This letter is in response to Mr. Cittone's letter dated December 8, 2020 concerning the continuing deposition of Hananya Cohen.

Defendants do not consent to continuing Mr. Cohen's deposition in writing. Defendants have approximately 20 or more documents to question Mr. Cohen, the majority of which were originated by Mr. Cohen.

The remaining areas of questioning concern the main issues in the lawsuit including Defendants' Amended Counterclaims against Mr. Cohen, that he: (1) Breached the 2011 Contract with Defendants and (2) Tortiously Interfered with the Contract and Business Relationship between Defendants and fortune five hundred company PPG, Industries, Inc., resulting in losses of millions of dollars suffered by Defendants. (See ECF #49, Counts I, II and III).

Also in a joint letter to this Court dated October 16, 2020 (ECF #130), Defendants requested leave to amend their Amended Counterclaim to add a cause of action that Mr. Cohen fraudulently conveyed all the shares of Plaintiff ADYB to his wife, Liat Cohen, during the pendency of this lawsuit. This is another area which Defendants intend to question Mr. Cohen during his deposition.

During the telephonic Status Conference on November 10, 2020, the Court requested a reminder as to the outstanding motions:

1. Defendants moved to join Hananya Cohen and Edwin Cohen which was fully briefed and submitted at the beginning of June 2020 (ECF# 93, 94, 95, 102 and 103).
2. Plaintiff moved to partially dismiss Defendants' counterclaim which was fully briefed and submitted at the beginning of June 2020 (ECF# 65, 66, 101, 104, 106, 107, 110, 111)
3. Hananya Cohen filed a motion to dismiss, which was fully briefed and submitted at the beginning of June 2020. (ECF # 91, 100, 105).
4. Defendants requested leave of the Court to amend their Counterclaim to include a fraudulent conveyance cause of action against Hananya Cohen. Plaintiff opposes Defendants' request. (ECF# 130).

Respectfully submitted,

*JEFFREY E. MICHELS*

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Jeffrey E. Michels, Esq.